

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	No. 3:17-CR-324
v.	:	
	:	Judge Caputo
FAIZAL BHIMANI, OM SRI SAI, INC.,	:	
NAZIM HASSAM, and POCONO PLAZA	:	
INN f/k/a QUALITY INN,	:	
Defendants.	:	

**GOVERNMENT STATEMENT CONCERNING**  
**SUPERSEDING INDICTMENT**

COMES NOW, the United States of America, by and through the undersigned Assistant United States Attorney, and in accordance with Local Rule 7.1 relating to Superseding Indictments, makes the following statement:

The superseding indictment contains the following changes in comparison to the preceding indictment:

- a. Count Three of the superseding indictment adds  
defendant Nazim Hassam and charges him with Drug  
Trafficking Conspiracy, in violation of 21 U.S.C. §§ 846  
and 841(a)(1).

- b. Count Four of the Indictment adds defendant Nazim Hassam and charges him with Managing a Drug Premises, in violation of 21 U.S.C. § 856(a)(2).
- c. Count 5 of the Indictment charges defendants Nazim Hassam and Pocono Plaza Inn f/k/a Quality Inn with Managing a Drug Premises, in violation of 21 U.S.C. § 856(a)(2)

Dated: July 10, 2019

DAVID J. FREED  
UNITED STATES ATTORNEY

/s/ Sean A. Camoni  
SEAN A. CAMONI  
Assistant U.S. Attorney  
Office of the U.S. Attorney  
W.J. Nealon Federal Building  
Scranton, Pennsylvania 18503

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10th day of July, 2019, I caused the foregoing *Government Statement Concerning Superseding Indictment* to be filed and that Attorneys Bernard J. Brown, Esquire, and William A. Destefano, Esquire, are both filing users under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Sarai Garcia  
SARAI GARCIA  
Legal Assistant